

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION

SHANNON LEWANDOWSKI

Plaintiff,

v.

Case No: 16-CV-1089

CITY OF MILWAUKEE

Defendant.

DECLARATION OF JANET L. HEINS

Pursuant to 28 U.S.C. § 1746, I hereby declare the following to be true under penalty of perjury:

1. I am a member of Heins Employment Law Practice LLC, counsel for the Plaintiff in this matter.
2. In late May 2018, I was notified that my specialized day care arrangement with a local center would not be renewed for my 9-year-old boy with Down syndrome and autism, and my attempts to obtain alternative care were unsuccessful, largely because he requires a full-time aide and additional supervisory personnel. I could not afford to hire a full-time nanny for him.
3. My son requires constant supervision at home, as he is nonverbal, a flight risk, and not fully toilet-trained, and I was unable to work much during the alternate weeks in the summer that I had placement of him opposite his father.
4. In mid-October, my 81-year-old father became gravely ill with kidney failure and was subsequently diagnosed with metastatic prostate cancer.
5. My sister and I, my father's only children, were with him in the hospital in Madison and in follow-up care for nearly two weeks, along with his wife, who does not drive and depends on others to transport her. During this time I was unable to work except sporadically.
6. I apologize for the impact my unforeseeable personal circumstances have had on the prosecution of this case, and I note that the above events have been resolved.

Dated this 31st day of October, 2018.

s/ Janet L. Heins
Janet L. Heins, State Bar No. 1000677